TO: +13102357420

Ρ. 2

Form NLRB - 601 (3-21)		
	UNITED STATES OF AMERICA	

NATIONAL LABOR RELATIONS BOARD

FIRST AMENDED CHARGE AGAINST EMPLOYER INSTRUCTIONS:

DO NOT WRITE IN THIS SPACE		
Case	Date Filed	
31-CA-290326		

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.				
1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT				
a. Name of Employer #1 (See additional employ	yers in attachment)	b. Tel. No.		
University of Southern California (US	C), Pac-12 Conference, and	USC: (213)740-7922 [See Attachment]		
The National Collegiate Athletics Association (NCAA), as joint employers		c. Cell No.		
d. Address (Street, city, state, and ZIP code) USC:	e. Employer Representative USC: Beong-Soo Kim	f. Fax No.		
3551 Trousdale Parkway, ADM 352,	_	g. e-mail		
Los Angeles, CA 90089-5013	[See Attachment]	gcoffice@usc.edu [See Attachment]		
_		h. Number of workers employed		
[See Attachment]		1113		
i. Type of Establishment (factory, mine, wholesaler, etc.) USC - University j. Identify Principal Product or Service Intercollegiate Athletics – FBS Football, NCAA Division I Men's and Women's Basketball				

1. The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.

2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)

Within the past six months, the above-named employers have interfered with, restrained, and coerced employees in the exercise of rights protected by Section 7 of the Act by repeatedly misclassifying employees as "student-athlete" nonemployees to circumvent the Act and their rights under the Act.

Within the past six months, the above-named employers have interfered with, restrained, and coerced employees in the exercise of rights protected by Section 7 of the Act by maintaining unlawful rules and policies in its handbook, including restricting communications with third parties, in the media, on social media, related to discipline, etc.

Full name of party filing charge (if labor organization, give full name, including local name and number) National College Players Association	
4a. Address (Street and number, city, state, and ZIP code) (b) (6), (b) (7)(C)	4b. Tet. No. (951) 898-0985 4c. Cell No.
	4d. Fax No. 4e. e-mail
5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled organization)	(b) (6), (b) (7)(C) d in when charge is filed by a labor
DECLARATION I declare that I have read the above charge and that the statements are true to the best of my knowledge and belief.	Tel. No. (951)898-0985
(b) (6), (b) (7)(C) $_{(b) (6), (b) (7)(C)}$	Office, if any, Cell No.
aking charge) (Print/type name and title or office, if any)	Fax No.
Address: (b) (6), (b) (7)(C) Date: 2/10/22	e-mail (b) (6), (b) (7)(C)

WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001) PRIVACY ACT STATEMENT

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 et seq. The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information will cause the NLRB to decline to invoke its processes

2/22/2022 6:34 PM FROM: Staples TO: +13102357420 P. 3

Additional Employer Information

Employer #2		
a. Name of Employer Pac-12 Conference		b. Tel. No. (415) 580-4200
		c. Cell No.
d. Address (Street, city, state, and ZIP code) 360 3rd Street, 3rd Floor San Francisco, CA 94107	e. Employer Representative Maggy Carlyle	f. Fax No.
i. Type of Establishment (factory, mine, wholesaler, etc.)	j. Identify Principal Product or Service	g. e-mail
Athletic Conference	Intercollegiate Athletics – FBS	
	Football, NCAA Division I Men's and Women's Basketball	h. Number of Workers Employed 113

Employer #3		
Name of Employer The National Collegiate Athletics Association (NCAA)		b. Tel. No.
		(317) 917-6222
_	,	c. Cell No.
d. Address (Street, city, state, and ZIP code) 1802 Alonzo Watford Senior Drive Indianapolis, IN 46202	e. Employer Representative Scott Bearby	f. Fax No.
i. Type of Establishment (factory, mine, wholesaler, etc.)	j. Identify Principal Product or Service	g. e-mail
Athletic Association	Intercollegiate Athletics – FBS	sbearby@ncaa.org
	Football, NCAA Division I Men's and	h. Number of Workers Employed
	Women's Basketball] 113



Attorneys at Law

Adam C. Abrahms t 310.557.9559 f 310.943.3367 AAbrahms@ebglaw.com

April 28, 2022

VIA EMAIL

Amanda Laufer Field Attorney National Labor Relations Board - Region 31 11500 W Olympic Blvd, Suite 600 Los Angeles, CA 90064-1753 Telephone: (310) 307-7337

Telephone: (310) 307-7337 Email: amanda.laufer@nlrb.gov

Re: University of Southern California (USC), Pac-12 Conference, and The

National Collegiate Athletics Association (NCAA)

Case 31-CA-290326

Dear Ms. Laufer:

As you are aware, this law firm represents the Respondent, the University of Southern California ("USC"), with respect to labor matters including the above-referenced matter.

Due to the tremendously expansive requests included in the Region's EAJA Letter, the busy time period at the end of the academic year, and the conclusion of the spring sports schedule at USC, we are, for the first time, requesting a two-week extension to file our position statement, with the relevant documents, until May 16, 2022. We believe this full extension is necessary to most effectively and efficiently aid in the Region's investigation and provide a meaningful response.

Should you have any questions, please do not hesitate to contact us.

Very truly yours,

Adam C. Abrahms

cc: Michael S. Ferrell (MFerrell@ebglaw.com)
Brock Olson (BOlson@ebglaw.com)

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P. 4

Form NLRB - 501 (3-21)

UNITED STATES OF AMERICA NATIONAL LABOR RELATIONS BOARD

FIRST AMENDED CHARGE AGAINST EMPLOYER INSTRUCTIONS:

DO NOT WRITE IN THIS SPACE
Case Date Filed

31-CA-290328 2/22/2022

File an original with NLRB Regional Director for If	ne region in which the alleged	d unfair fabor practice occurr	ed or is occurring.
EMPLOYER AGAINST WHOM CHARGE a. Name of Employer #1 (See additional employers in attachment) University of California, Los Angeles (UCLA), Pac-12 Conference, and The National Collegiate Athletics Association (NCAA), as joint employers		b. Tel. No. rence, UCLA; (3	10) 825-2151 [See Attachment]
d. Address (Street, city, state, and ZIP code) UCLA: Box 951405, 2147 Murphy Hall Los Angeles, CA 90095-1405 [See Attachment]	e. Employer Representative UCLA: Gene Block [See Attachment] g. e-ma UCI h. Num		ancellor@ucla.edu [See Attachment] workers employed
i. Type of Establishment (factory, mine, wholesaler, etc.) UCLA — University intercollegiate Athle		Men's and Women's practices within the meaning	ics - FBS Football, NCAA Division I Basketball of section 8(a), subsections (1) of the
National Labor Relations Act, and these unfair lat practices are practices affecting commerce within 2. Basis of the Charge (set forth a clear and cond Within the past six months, the abover the exercise of rights protected by Sect nonemployees to circumvent the Act and Within the past six months, the abover the exercise of rights protected by Sect including restricting communications with 3. Full name of party filing charge (if labor organic National College Players Association)	por practices are practices at the meaning of the Act and itse statement of the facts contamed employers have ion 7 of the Act by repend their rights under the named employers have ion 7 of the Act by maintain 7 of the Act by maintain 7 of the Act by maintain third parties, in the nation, give full name, including the Act by maintain the parties, in the nation, give full name, including the Act by maintain the parties, in the nation, give full name, including the Act by maintain th	faciling commerce within the the Postal Reorganization A instituting the alleged unfair land interfered with, restrain eatedly misclassifying eatedly misclassifying eated. Interfered with, restrain intaining unlawful rules media, etc.	meaning of the Act, or these unfair labor ct. abor practices) ned, and coerced its employees in employees as "student-athlete" ned, and coerced its employees in
49. Address (Street and number, city, state, and (b) (6), (b) (7)(C)	ŽIP cade)		4b. Tel. No. (951) 898-0985 4c. Cell No. 4d. Fax No. 4e. e-mail (b) (6), (b) (7)(C)
5. Full name of national or international labor organization)	anization of which it is an am	Hate or consequent unit (10 h	e mied in when charge is med by a japor
I declare that I have read the above char-	ge and that the statements a ledge and ballef.	·	(951) 898-0985 Office, if any, Cell No.
	Date:	1)(C) ne and title or office, if any)	Fax No. e-mail (b) (6), (b) (7)(C)
		5 Test 1 Commit	

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d. Address (Street, city, state, and ZIP code) 360 3rd Street, 3rd Floor San Francisco, CA 94107	e. Employer Representative Maggy Carlyle	f. Fax No.
Type of Establishment (factory, mine, wholesaler, etc.) Athletic Conference	j. Identify Principal Product or Service Intercollegiate Athletics - FBS Football, NCAA Division I Men's and Women's	g. e-mail h. Number of Workers Employed
	Basketball	113

Employer #3

a. Name of Employer The National Collegiate Athletics Association (NCAA)		b. Tel. No. (317) 917-6222 c. Cell No.
d. Address (Street, city, state, and ZIP code) 1802 Alonzo Watford Senior Drive Indianapolis, IN 46202	e. Employer Representative Scott Bearby	f. Fax No.
i. Type of Establishment (factory, mine, wholesaler, etc.) Athletic Association	j. Identify Principal Product or Service Intercollegiate Athletics - FBS Football, NCAA Division I Men's and Women's Basketball	g. e-mail sbearby@ncaa.org h. Number of Workers Employed